

ATTACHMENT A

To: Dorothy Farmer, BellSouth
From: Chris Bunce, Birch Telecom
Re: DUF charges proposed rate sheets
Date: July 10, 2002

I apologize for the earlier document I forwarded to you prematurely. Please discard those comments and replace them with the below analysis and requested revisions. This includes DUF comments for all states.

ALABAMA

ADUF - Message Processing - The rate that you propose (\$0.004) is higher than the rate included in the SGAT dated June 17, 2001 (**\$0.001851**).

ADUF - Data Transmission - The rate that you propose (\$0.001) is considerably higher (almost 10 times) than what was ordered in Docket No. 27821 on April 9, 2002 (**\$0.000113**).

ODUF - Recording - The rate that you show (\$0.0002) is considerably higher (almost 20 times) than what was ordered in Docket No. 27821 (\$0.000011). It is our understanding BellSouth has indicated that UNE-P CLECs should never pay this rate. The BellSouth proposal in the Georgia cost proceeding was \$0.0000088. Birch requests a **zero** rate for this element.

ODUF - Message Processing - The rate that you show (\$0.0033) is almost double what BellSouth offered in the Georgia UNE cost proceeding (**\$0.002495**).

ODUF - Data Transmission - The rate that you show (**\$0.00004**) is acceptable.

GEORGIA

ADUF - Message processing - BellSouth proposed ADUF rate to the FCC is **\$0.001848**. Since this is what BellSouth believes is its cost, we do not understand why BellSouth did not offer this rate at a minimum instead of a rate that is almost 10 times higher (\$0.0136327).

ODUF - Recording - As noted above, BellSouth has said that UNE-P CLECs should not be required to pay the ODUF Recording charge. The GA cost proceeding proposed rate was \$0.000087. Birch requests a **zero** rate.

ODUF -- Message Processing: The current SGAT Rate is \$0.0046462 - almost half what you offered. The BellSouth cost proposal was **\$0.00245**, about one-third of what was offered. Birch requests the cost proposal rate.

KENTUCKY

ODUF - Recording - The Georgia SGAT rate is \$0.000009. The BellSouth proposal in the Georgia cost proceeding was \$0.0000088. Birch requests a **zero** rate.

ADUF - Data Transmission - BST's proposed rate was slightly higher than the 3/28/02 SGAT rate (**\$0.00012447**).

LOUISIANA

Birch requests a **zero** rate for ODUF - Recording.

MISSISSIPPI

ADUF - Message Processing - The rate that you show (\$0.008087) is almost five times higher to what BellSouth offered in the Georgia UNE cost proceeding and the 5/28/02 SGAT shows a **\$0.001861** rate.

ADUF - Data Transmission - The rate you propose (\$0.00012803) is higher than the 5/28/02 SGAT rate of **\$0.00012278**.

ODUF - Recording - As noted above, BellSouth has indicated that UNE-P CLECs should never pay this rate. Birch requests a **zero** rate.

ODUF - Message Processing - The rate that you show (\$0.004707) is almost double to what BellSouth offered in the Georgia UNE cost proceeding and the 5/28/02 SGAT shows a **\$0.002509** rate.

ODUF – Data Transmission – The rate you show (\$0.00010669) is greater than the 5/28/02 SGAT rate of **\$0.00010232**.

NORTH CAROLINA

ODUF – Data Transmission – We believe the rate you show (\$0.0004) may be a typo and should reflect the 7/19/01 approved AT&T ICA rate of **\$0.00004**.

Birch requests a **zero** rate for ODUF – Recording.

SOUTH CAROLINA

ADUF - Message Processing - The rate that you show (\$0.008061) is more than four times higher than what BellSouth offered in the Georgia UNE cost proceeding and the 5/30/02 Order and SGAT reflects a **\$0.001856** rate.

ADUF – Data Transmission – The rate that you show (\$0.00013036) is greater than the 5/30/02 SGAT rate of **\$0.00012515**.

ODUF - Recording – As noted above, BellSouth has indicated that UNE-P CLECs should never pay this rate. Birch requests a **zero** rate for ODUF – Recording.

ODUF - Message Processing - The rate that you show (\$0.004704) is almost double to what BellSouth offered in the Georgia UNE cost proceeding and higher than the 5/30/02 Order and SGAT rate of **\$0.002508**.

ODUF – Data Transmission – The rate you proposed (\$0.00010863) is greater than the 5/30/03 Order and SGAT rate of **\$0.00010429**.

TENNESSEE

Birch requests a **zero** rate for ODUF – Recording.